DOCKET FILE COPY ORIGINAL

RECEIVED

MAY - 8 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**IST***echnologies*
412 - 78 O'Connor Street,
Ottawa, ON. K1P 3A4
CANADA
(613) 781 7293

OTTAWA, 8 May, 1998

Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554
The United States of America

Attn: Ms. Magalie R. Salas

Subject: In the Matter of *The Communications Assistance for Law Enforcement Act*
**CC Docket No. 97-213**
Comments Pursuant to Public Notice **DA 98-762** (rel. April 20, 1998)

Enclosed for filing in the above referenced proceeding is an original and four (4) copies of the Comments by Bell Emergis – Intelligent Signalling Technologies regarding the implementation of the assistance capability requirements as required by Section 107 of the Communications Assistance for Law Enforcement Act, 47 U.S.C. § 1001 and § 1006.

An additional copy of the Comments is enclosed to be stamped "received" and returned.

Thank you very much for your attention to this matter.

Sincerely,

Gerald W. Fikis, P.Eng.
Group Leader - Technology & BL Mgmt

No. of Copies rec'd 0+5
List ABCDE

**Before the**
**Federal Communications Commission**
**Washington, D.C. 20554**

| | | |
|---|---|---|
| **In the Matter of:** | ) | |
| | ) | CC Docket No: 97-213 |
| **Communications Assistance for Law** | ) | |
| **Enforcement Act** | ) | |

COMMENTS OF

Bell Emergis - Intelligent Signalling Technologies
Suite 412, 78 O'Connor Street
Ottawa, Ontario,
CANADA

Filed on May 8, 1998.
**CC Docket No. 97-213**
Pursuant to Public Notice **DA 98-762** (rel. April 20, 1998)

**To: The Commission**

1. Introduction

Bell Emergis[1] – Intelligent Signalling Technologies is a manufacturer of network-centric signalling software products and offers end-to-end integrated product solutions to the telecommunications industry. The petitions noted in Public Notice DA 98-762 identify concerns surrounding the technical ability of providing complex electronic monitoring within modern telecommunications networks. The advanced capabilities needed to address these requirements are central to our primary product focus. It is on this basis that Bell Emergis – Intelligent Signalling Technologies offers comments presented herein, for the Commission's consideration and proceedings relating to motions noted in that Public Notice.

[1] Bell Emergis is a Division of Bell Canada, the largest operating telecommunications carrier in Canada.

## 2. Summary

Based on our development activities to date, it is Bell Emergis – Intelligent Signalling Technologies' (hereafter identified as "IST") considered opinion that:

a) The focus of the CALEA technical standards should be broadened to allow network-based solutions, either:
   ( i) optionally, or
   ( ii) to displace requirements from other network elements (ie: switches)
b) Given a) above, substantial extensions to the October 1998 compliancy date are not mandatory
c) Given a) above, a significant number of the identified requirements, including those of the "punch list" are readily achievable.
d) Given c) above, the need to reassess published standards may be optional and need not necessarily be seen as impacting the October 1998 compliancy date.

## 3. Background

The central view of many of the Petitions cited in Public Notice 98-762 express considerable concern with industry's ability to achieve the goals of the Communications Assistance for Law Enforcement Act ("CALEA"). These views are often expressed within the context of the degree of compliance to published requirements that can reasonably expected to be achieved, particularly by October 1998. IST's analysis of the bodies of work describing the technical requirements of CALEA has identified a predisposition to switched-based solutions. In so doing, any vendor could be expected to experience difficulties in meeting certain requirements by virtue of their product's fundamental design, from either hardware and /or software perspectives. Albeit there are certain CALEA requirements which can best be viewed from the operations and conditions known only to the switch which supports the target number, there are many other capabilities which may be equivalently provided elsewhere in a telecommunications network. Unfortunately, the standards have not explicitly provided for other than switched-based functionality and there is no direction provided to guide a concept of "sharing" of responsibilities to meet the spirit of CALEA on a broader, network perspective, for example.

## 4. The Network-Centric View

IST has a legacy of active involvement in the research and development of state-of-the-art capabilities aimed at fulfilling the needs of the law enforcement activities in both Canada and the United States. As a manufacturer of telecommunications network-based products, we have been pleased to demonstrate our capabilities to both industry as well as the Canadian Security Intelligence Service, the Royal Canadian Mounted Police, European law enforcement agencies and in significant detail, to the Federal Bureau of Investigation. These demonstrations have been conducted using the remote access capabilities of our product, based on information gathered from telecommunications traffic generated in Ottawa[2], ON (Canada). Of particular note, the FBI has shown strong integrity, leadership and direction in their process of assessing our product's capabilities.

In providing a network-based solution, IST innovation and new network components underpin the design. This introduces several significant benefits:

a) a more cost effective solution (over switched-based solution projected costs),
b) consistent feature functionality across a network (switch vendor independent),
c) fundamental design is applicable to both the wireline and wireless environments, and
d) a significant proportion of the desired feature set identified by law enforcement agencies is readily supported in the product.

As noted earlier in these Comments, certain CALEA functionality can only be provided through a switch-based approach. IST will shortly be taking steps to identify areas where mutual co-operation with switch vendors could ultimately lead to fully compliant networks for all telecommunications operators deploying IST's product line.

## 5. The October 1998 Compliancy Date

IST is anxious to complete productization and rollout activities for its network-based CALEA-compliant product. Among other things, this includes the need for in-depth conformance testing against the CALEA requirements as well as the signalling network

[2] Wireline network. Ottawa's metropolitan area population is in the 1,000,000 range.

protocol and its procedural interworkings. Industry's broader concerns with CALEA however, have introduced uncertainty and delays into this necessary activity.

Irrespective of whatever solution is ultimately chosen by an operating company, a pragmatic view would suggest that with less than 6 months remaining before the October 25, 1998 date, serious challenges in terms of network engineering; contract negotiation; product material sourcing; installation, turn-up and integration testing, and training remain.

We believe that our solution provides a novel approach to resolving some of the issues surrounding compliance to CALEA. An option which may exist in a restructured "safe harbor" provision therefore, may be targeted /prioritized deployment. IST's lead CALEA product clearly provides superior electronic surveillance capabilities over today's limited feature set and may therefore at a minimum, facilitate a stop-gap measure with the added ability of being able to be extended to full network and feature compliancy.

Respectfully submitted:
Bell Emergis – Intelligent Signalling Technologies

By: Gerald W. Fikis
Group Leader - Technology & Business Line Management
Bell Emergis - Intelligent Signalling Technologies
Suite 412
78 O'Connor Street
Ottawa, ON. Canada K1P 3A4
(613) 781-7293

8 May 1998